

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE :

Irving Sullivan,  
Cheryl Sullivan

Case No. 08 B 34083  
Chapter 13

Honorable Judge Cox

Debtors.

**RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

Now comes, Litton Loan Servicing, LP and files this Response to the Trustee's Notice of Final Mortgage Cure Amount and in support states as follows:

1. That on April 15, 2014, Chapter 13 Trustee Tom Vaughn filed a Notice of Final Cure Payment. The Notice was subsequently served on Beneficial Illinois and indicated that if the creditor must file a response within twenty-one days of said Notice. This response is being filed within that time frame.
2. The Debtor is not current on its post-petition mortgage payments on Beneficial Financial I Inc., successor by merger to Beneficial Illinois, first lien regarding the real estate located at: 8012 S. Aberdeen St., Chicago, IL 60620 ("Real Estate").
3. That since there is a post petition default the mortgage should not be considered fully reinstated.
4. The loan is post petition for escrow advances. The following is due and owing:
  - i. Escrow advances of \$4,697.08;
    - A) \$1,516.14 for mortgage payment due 5/1/2014;
    - B) \$3,155.94 for real estate taxes; and,
    - C) \$25.00 for Non-Sufficient Fees.

That the total post petition default totals \$4,697.08. That based upon Debtor's default, the mortgagee is not required to treat the mortgage reinstated and fully current. The creditor reserves the right to amend this response.

Respectfully submitted,

/s/ Michael J. Block  
Attorney for Beneficial Financial I Inc., as  
successor by merger to Beneficial Illinois  
Kozeny & McCubbin Illinois, LLC  
105 W. Adams, Suite 1850  
Chicago, IL 60603  
(P) 312-605-3500  
Our File# IL-001037

**CERTIFICATE OF SERVICE**

I hereby certify that on May 6, 2014, I electronically filed the attached Response to Notice of Final Cure Payment with the Clerk of the Court using the CM/ECF system which will send notifications of such filing(s) to the following:

Mark J Lubus  
Leeders & Associates  
20 E Jackson Blvd Ste 850  
Chicago, IL 60604  
(312) - 4277400  
Email: [mlubus@leederslaw.com](mailto:mlubus@leederslaw.com)

Trustee - Tom Vaughn  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
312 294-5900

U.S. Trustee - Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604  
312-886-5785

And as to the other parties listed below, by placing the same in a U.S. Mail box in Chicago, Illinois, enclosed in an envelope with first class postage pre-pad, addressed as shown below:

Irving Sullivan  
8012 S. Aberdeen St.  
Chicago, IL 60620

Cheryl Sullivan  
8012 S. Aberdeen St.  
Chicago, IL 60620

Respectfully Submitted by:

/s/ Michael J. Block  
Attorney for Plaintiff

Michael J. Block  
Kozeny & McCubbin Illinois, LLC  
105 W. Adams, Suite 1850  
Chicago, IL 60603  
(P) 312-605-3500